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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:

LASER INNOVATIONS, INC.,

Debtor.

§
§
§
§
§

**CASE NO. 24-34781
Chapter 11**

**DEBTOR'S EMERGENCY MOTION
FOR USE OF CASH COLLATERAL**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW Laser Innovations, Inc., the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the "Debtor"), and files this its Debtor's Emergency Motion for Use

of Cash Collateral pursuant to 11 U.S.C. § 363 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On October 11, 2024, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

2. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

3. No request has been made for the appointment of a trustee or examiner and no official committee has been appointed.

4. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

5. Debtor requests the Court to enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit “A.”**

6. Debtor has an immediate need to use the cash collateral of the U.S. Small Business Administration, De Lage Landen Financial Services, Inc., Headway Capital, LLC and Byzfunder NY LLC (the “Secured Lenders”), the Debtor’s secured creditors claiming liens on Debtor’s real and personal property including accounts.

7. The Debtor can adequately protect the interests of the Secured Lenders as set forth in the proposed Interim Order for Use of Cash Collateral by providing the Secured Lenders with post-petition liens, a priority claim in the Chapter 11 bankruptcy case, and cash flow payments. The cash collateral will be used to continue the Debtor’s ongoing operations.

8. The Debtor owns and operates Innovative Lasers of Houston, a laser weight loss company, located at 7700 San Felipe Street, Suite 485, Houston, Texas 77063.

9. The Budget attached to the proposed Order and to this Motion permits the payment of ongoing operating expenses of the Debtor in order to allow the Debtor to maintain its operations in Chapter 11.

10. The Debtor intends to rearrange its affairs and needs to continue to operate in order to pay its ongoing expenses, generate income and to propose a plan in this case. The Debtor's proposed Budget is attached hereto as **Exhibit "B."**

11. This is an emergency matter since the Debtor has no outside sources of funding available to it and must rely on the use of cash collateral to continue its operations.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit "A"** and for such other and further relief to which the Debtor may be justly entitled.

Dated: October 21, 2024.

Respectfully submitted,

/s/ Joyce W. Lindauer
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PROPOSED ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 21, 2024, a true and correct copy of the foregoing document was served upon the parties on the attached service list in the manner indicated.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

Label Matrix for local noticing
0541-4
Case 24-34781
Southern District of Texas
Houston
Mon Oct 21 15:38:30 CDT 2024

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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Comptroller of Public Accounts
Revenue Accounting Division
Bankruptcy Section
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De Lage Landen Financial Services
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Harris County Tax Assessor Collector
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(d)Harris County, et al
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